

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI - CENTRAL DIVISION**

**JOHN P. LIPP and STEPHANIE S. LIPP,**

**Plaintiffs,**

**vs.**

**GINGER C., L.L.C., PI KAPPA PHI  
FRATERNITY NATIONAL  
HEADQUARTERS, and PI KAPPA PHI  
FRATERNITY MISSOURI BETA  
EPSILON CHAPTER,**

**Defendants.**

**CASE NO. 2:15-CV-4257-NKL**

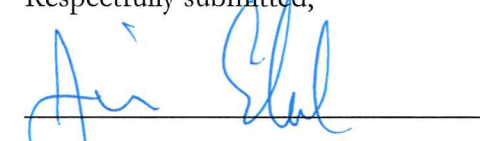
**DEFENDANTS' MOTION TO DISMISS**

Defendants Pi Kappa Phi Fraternity, Inc. ("National") and Pi Kappa Phi Fraternity Missouri Beta Epsilon ("Chapter") (collectively, the "PKP Defendants"), file this Motion to Dismiss pursuant to Federal Rule of Civil Procedure 12(b)(6), and ask this Court to dismiss all claims made against them in this matter for failure to state a claim upon which relief can be granted.

Pursuant to Local Rule 7.0(c), the PKP Defendants' Suggestions in Support of the Motion to Dismiss are filed contemporaneously with this motion. For the reasons set forth in the PKP Defendants' Suggestions in Support of the Motion to Dismiss, the PKP Defendants respectfully request that the claims against them be dismissed in their entirety.

Respectfully submitted,

By:



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**ATTORNEYS FOR DEFENDANTS**

**CERTIFICATE OF SERVICE**

I certify that the foregoing has been served upon the following counsel by first class United States mail, postage prepaid and by facsimile, this \_\_\_\_ day of January 2016.

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